



NOV 07 1995

Hazardous Waste Compliance
Monitoring and Enforcement LogFORM
A

HANDLER

ID Number: KSD007246846 LDF () TSF (X) GEN (K) KG () SQ () TRA ()
HWM () HWB () UOM () UOB () NOT A GEN ()Handler Name: HYDROCARBON RECYCLERS, INC * AT N/A CL N/A
FT 11-9-95 RCRIS 11-15-95Street: 2549 NORTH NEW YORK City: WICHITA 67219 County: SEDGWICKEVALUATION New ☐ Followup: Date (on site) ☐ ☐ ☐ Date (of letter) 11 02 95 Delete ☐Date 95 07 21 Agency S Type CSE Reason 01 Person GLP District SC

Areas of Evaluation (EV - Evaluted, NE - Not Evaluted, NA - Not Applicable)

Generator		Transporter		Treatment/Storage/Disposal Facility				Other	
GER <u>EV</u>	GPT <u>EV</u>	TGR <input type="checkbox"/>		DCH <u>EV</u>	DGW <input type="checkbox"/>	DMC <u>EV</u>	DPP <input type="checkbox"/>	BRR <input type="checkbox"/>	
GGR <u>EV</u>	GRR <u>EV</u>	TMR <input type="checkbox"/>		DCL <u>EV</u>	DIN <input type="checkbox"/>	DMR <u>EV</u>	DSI <input type="checkbox"/>	CAS <input type="checkbox"/>	
GLB <u>EV</u>	GSC <input type="checkbox"/>	TOR <input type="checkbox"/>		DCP <u>EV</u>	DLB <u>EV</u>	DOR <input type="checkbox"/>	DTR <input type="checkbox"/>	CSS <input type="checkbox"/>	
GMR <u>EV</u>	GSQ <input type="checkbox"/>	TRR <input type="checkbox"/>		DFR <u>EV</u>	DLF <input type="checkbox"/>	DOT <input type="checkbox"/>	DTT <input type="checkbox"/>	FEA <input type="checkbox"/>	
GOR <input type="checkbox"/>		TWD <input type="checkbox"/>		DGS <u>EV</u>	DLT <u>EV</u>	DPB <input type="checkbox"/>	DWP <input type="checkbox"/>	ILD <input type="checkbox"/>	

Used Oil UOM ☐ UOB ☐ UTM ☐ SUM ☐ SUB ☐COMMENTS IN COMPLIANCE TO JULY, 1995 INSPECTION *PURCHASED BY LAIDLAW.

Facility Name:

HYDROCARBON RECYCLERS, INC.

VIOLATION # 1 Date Determined 07 20 95
New ☐ Change ☒ Delete ☐ Comments ☐
Agency S Number 23 Area GPT Class 2 Priority 5 Type R
Regulation Citation: KAR 28-31-4(j)
Description: Satellite DM Returned to Compliance not closed.
Scheduled: 08 20 95
Actual: 07 21 95

VIOLATION # Date Determined
New ☐ Change ☐ Delete ☐ Comments ☐
Agency S Number Area Class Priority Type
Regulation Citation:
Description: Returned to Compliance
Scheduled:
Actual:

VIOLATION # Date Determined
New ☐ Change ☐ Delete ☐ Comments ☐
Agency S Number Area Class Priority Type
Regulation Citation:
Description: Returned to Compliance
Scheduled:
Actual:

VIOLATION # Date Determined
New ☐ Change ☐ Delete ☐ Comments ☐
Agency S Number Area Class Priority Type
Regulation Citation:
Description: Returned to Compliance
Scheduled:
Actual:

RCRA



551112

FORM
B

Handler Name:

VIOLATION #		Date Determined		M M		D D		Y Y		
New	<input type="checkbox"/>	Change	<input type="checkbox"/>	Delete	<input type="checkbox"/>	Comments				
Agency	Number		Area		Class	Priority		Type		
<input type="text" value="S"/>	<input type="text"/>		<input type="text"/>		<input type="text"/>	<input type="text"/>		<input type="text"/>		
Regulation Citation: _____										
Description: _____					Returned to Compliance					
_____					M M		D D		Y Y	
_____					<input type="text"/>		<input type="text"/>		<input type="text"/>	
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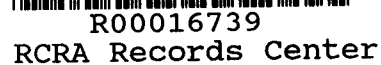
New ☐ Change ☐ Delete ☒

Person

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Agency	Violation Number	Area
S		
S		
S		
S		

Comments: _____



Rev. 4-94

State of Kansas



Bill Graves

Governor

Department of Health and Environment
James J. O'Connell, Secretary

November 2, 1995

Mr. Gary A. Burns, Facility Manager
Laidlaw Environmental Services/HRI, Inc.
2549 North New York
Wichita, Kansas 67219

Re: Hazardous Waste Compliance Inspection
Facility: **Hydrocarbon Recyclers, Inc. of Wichita**
EPA Identification Number KSD007246846

Dear Mr. Burns:

I have reviewed your written response received into this office on August 21, 1995 which outlines the actions you've taken to correct the violation cited during my July 21, 1995 inspection of your facility.

Based on the information contained in your response, your facility is in compliance to hazardous waste management regulations relevant to the findings of my inspection. Note: The recent purchase of Hydrocarbon Recyclers, Inc. of Wichita by Laidlaw Environmental Services will necessitate changes to the facility contingency plan and to the facility's Part B permit.

Thank you for your cooperation with the hazardous waste management program. If you have further questions regarding the inspection or this letter, call me at the district telephone number listed below.

Respectfully,

A handwritten signature in cursive script, reading "Gilbert L. Perez".

Gilbert L. Perez, CHMM
Waste Management Programs
Bureau of District Operations

GLP:HRI795.Fin

pc: John Mitchell, Hazardous Waste Section, BWM, KDHE, Topeka
Ron Smith, Compliance/Enforcement Section, BWM, KDHE, Topeka ✓
SCD File

LAIDLAW
ENVIRONMENTAL
SERVICES

August 10, 1995

Gilbert Perez
Kansas Department of Health and Environment
Bureau of District Operations
130 South Market, Sixth Floor
Wichita, Kansas 67202-3802

RECEIVED
AUG 21 1995
South Central District

Re: **Hydrocarbon Recyclers, Inc. of Wichita, EPA ID No. KSD007246846**
Facility Inspection on July 21, 1995

Dear Mr. Perez:

As a result of your inspection on July 21, 1995, a Notice of compliance/Non-Compliance was issued alleging one violation. This letter conveys our response to that Notice, and to other notes and comments included in it.

Alleged violation:

The notice alleged violation of KAR 28-31-4(j), "One satellite drum used for accumulation of PPE used in process area was not closed - i.e. funnel lid not 'attached'."

Response:

The funnel lid in question was repaired that same day, July 21, 1995.

Notes and comments:

"Rod Brown noted in his file review that certain Part B revisions copies did not appear in the on-site document provided for review during the inspection. Explain this discrepancy and reason for certification statement for V-29 - 32 tank closure different than 40 CFR 270.11."

"Boot wash process container shouldn't be labeled 'Hazardous Waste'."

Responses:

Text changes as a result of modifications to the Part B Application dated March 22, 1994 and July 25, 1994 have been incorporated in the on-site copies of the Application.

Enclosed is a copy of a letter from Gary Burns, Vice President of Operations, resubmitting the certification for the closure of tanks V-29 - 32 in the form required by 40 CFR 270.11.

We agree that the material contained in this equipment is process material and not waste, until it is determined to be unsuitable for further use and removed for disposal. The "Hazardous Waste" marking has been removed from the boot wash.

Sincerely,



Gary A. Burns
Facility Manager, Vice President of Operations

enclosure

August 10, 1995

John W. Mitchell
Chief of the Hazardous Waste Section
Kansas Department of Health and Environment
Forbes Field, Building 740
Topeka, Kansas 66620-0001

Re: **Hydrocarbon Recyclers, Inc. of Wichita, EPA ID No. KSD007246846**
Closure of Tanks V-29, V-30, V-31, V-32

Dear Mr. Mitchell:

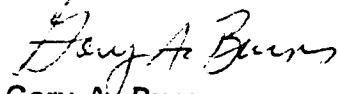
Attached is certification by Mr. Cary Mans, a Professional engineer registered in Kansas, of closure of these four tanks pursuant to the requirements in Section J of our Permit Application. The certification was previously provided to your office on July 6, 1995.

This information is submitted in accordance with 40 CFR 270.11.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to be the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

This completes the closure of these tanks. Thank you for your cooperation in this matter.

Sincerely,



Gary A. Burns
Vice President of Operations
Hydrocarbon Recyclers, Inc. of Wichita

attachment

cc: M. Bradbury, KDHE District Office
A. Chadwick, LES
Permit File

USPCI

Hydrocarbon Recyclers, Inc. of Wichita 2549 North New York
Wichita, Kansas 67219
Wats 800.316.0037 Phone 316.268.7500 Fax 316.268.7555

State of Kansas

Bill Graves



Governor

Department of Health and Environment

James J. O'Connell, Secretary

May 5, 1995

Mr. Ron Robertson, Facility Compliance Officer
Hydrocarbon Recyclers, Inc. of Wichita
2549 North New York
Wichita, KS 67219

Re: RCRA Financial Assurance
Hydrocarbon Recyclers, Inc. of Wichita Facility
EPA I.D. KSD007246846

Dear Mr. Robertson:

The Kansas Department of Health and Environment (KDHE) has completed a review of the replacement financial assurance document for the above referenced TSD facility which was transmitted with your letter of February 17, 1995. The assurance document was replaced in connection with the acquisition of the facility owner by Laidlaw, Inc., Burlington, ON, Canada. Both the original and replacement documents are issued directly to Hydrocarbon Recyclers, Inc. of Wichita, as facility owner and operator, by the third-party providers of the instruments.

The form and amount of the replacement closure cost assurance instrument, consisting of a National Insurance and Indemnity Corporation Certificate of Insurance, were found to be adequate. Therefore, KDHE finds the Hydrocarbon Recyclers, Inc. of Wichita TSD facility to be in compliance with the requirements of 40 CFR 264/265 Subpart H with respect to closure cost assurance.

The replaced financial assurance instruments, consisting of Banque Nationale De Paris Letter of Credit [REDACTED] and Amendments [REDACTED], are enclosed herewith, and may now be cancelled. The related Standby Trust Fund Agreement between Hydrocarbon Recyclers, Inc. of Wichita and Boatmen's First National Bank of Oklahoma, last amended and signed May 25, 1993 (not enclosed), may also be terminated. Ex. 4

Thank you for your cooperation with the Kansas hazardous waste management program. Please call me at (913) 296 0680 if you have questions or comments.

Sincerely,

A handwritten signature in cursive script that reads "James L. Gilliland".

James L. Gilliland
Financial Assurance Accountant
Bureau of Waste Management
Enclosure(1)

cc: Wes Bartley, EPA, Region VII
Mark Bradbury - DEA/SCDO/Waste Progs.

Waste Treatment & Recovery Services

February 17, 1995

Kansas Department of Health and Environment
Bureau of Waste Management, Hazardous Waste Section
Forbes Field, Building 740
Topeka, Kansas 66620-0001
Attention: James L. Gilliland

Re: **Hydrocarbon Recyclers Inc. of Wichita, EPA ID Number KSD007246846,
Financial Assurance Documentation**

Dear Mr. Gilliland,

Enclosed please find the Certificate of Insurance for Closure or Post-Closure Care which will replace the Letter of Credit currently on file with your department. As I informed you by telephone today, our company was purchased from Union Pacific Corporation by Laidlaw Environmental, Inc., effective December 31, 1994. The Letter of Credit, which was guaranteed by Union Pacific, will be superseded by insurance provided through Laidlaw.

The amount of the facility closure cost estimate and of the Certificate of Insurance has been increased by the 1994 implicit deflator factor of 1.026, to \$1,334,313.

Please return the Letter of Credit to me, as requested by our corporate office.

Thank you for your assistance,



Ron Robertson
Facility Compliance Officer

cc: Jeff Cassell

L A I D L A W

LAIDLAW INC.

111 NORTH SERVICE ROAD, P.O. BOX 1200, SUITE 100, WICHITA, KANSAS 67219-1200 (PHONE) (913) 339-3970 FAX (913) 339-3970

February 14, 1995

Mr. Steve Keiter
Hydrocarbon Recyclers, Inc. of Wichita
2549 North New York Street
WICHITA, Kansas 67219

Dear Mr. Keiter:

Re: Replacement of Existing Letter of Credit

You presently have a letter of credit for \$1,300,500.00 issued and lodged with the Kansas Department of Health & Environment.

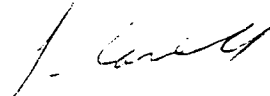
As this was issued on the guarantee of Union Pacific, we need to replace this.

Attached hereto is a Certificate of Insurance for an increased amount of \$1,334,313.00 (as advised by Bill Vore) and fully in compliance with the regulations.

Could you please arrange to swap this Certificate for the existing LOC and return the original LOC to myself.

Any questions, please call myself or Bill Vore.

Sincerely,
LAIDLAW INC.



JEFF CASSELL
VICE PRESIDENT, CORPORATE
RISK MANAGEMENT

JC/lc
Encl.

c.c. Bill Vore

JC\CORRESPB95\KEITER

NATIONAL INSURANCE AND INDEMNITY CORPORATION

East O'Lake, Lakewood Commons, Suite 200, 1233 Shelburne Road

South Burlington, Vermont 05403

Tel: (802) 660-0446

Fax: (802) 658-0112

CERTIFICATE OF INSURANCE FOR CLOSURE OR POST-CLOSURE CARE

Name and Address of Insurer (hereinafter called the "Insurer"):

National Insurance and Indemnity Corporation

East O'Lake, Lakewood Commons, Suite 200, 1233 Shelburne Road

South Burlington, Vermont 05403

Name and Address of Insured (hereinafter called the "Insured"):

Hydrocarbon Recyclers, Inc. of Wichita

2549 North New York St.

Wichita, Kansas 67219

Facility Covered:

EPA Identification Number: KSD 007 246 846

Name: Hydrocarbon Recyclers Inc., of Wichita

Address: 2549 North New York St., Wichita, Kansas 67219

Closure: \$1,334,313.00

Face Amount: \$1,334,313.00

Policy Number: Ex. 4

Effective Date: February 15, 1995

The Insurer hereby certifies that it has issued to the Insured the policy of insurance identified above to provide financial assurance for closure for the facility identified above. The Insurer further warrants that such policy conforms in all respects with the requirements of 40 CFR 264.143(e), 264.145(e), 265.143(d), and 265.145(d) as applicable and as such regulations were constituted on the date shown immediately below. It is agreed that any provision of the policy inconsistent with such regulations is hereby amended to eliminate such inconsistency.

Whenever requested by the Kansas Department of Health & Environment, the Insurer agrees to furnish to the Kansas Department of Health & Environmental a duplicate original of the policy listed above, including all endorsements thereon.

I hereby certify that the wording of this certificate is identical to the wording specified in 40 CFR 264.151(e) as such regulations were constituted on the date shown immediately below.

Tobias P. Burke

(Authorized signature for Insurer)

Tobias P. Burke

(Name of person signing)

Manager

(Title of person signing)

Leslie A. Carlson

(Signature of witness or notary)

February 14, 1995

(Date)

To:- Kansas Department of Health & Environment
Forbes Field
Building 740
Topeka, Kansas 66620-7202



**Laidlaw
ENVIRONMENTAL
SERVICES**

June 22, 1995

John Mitchell
Kansas Department of Health and Environment
Hazardous Waste Section
Forbes Field, Building 740
Topeka, Kansas 66620-0002

Re: Hazardous Waste Permit, EPA ID Number KSD007246846:
Changes to Emergency Response Coordinator List

JUN 23 1995

Dear Mr. Mitchell:

As we discussed by phone today, several changes will take place in the management personnel at this facility during June and July of this year. As of June 16, Stephen Keiter is no longer facility manager, and Beth Justice will no longer be Operations Manager as of June 30. Gary Burns, the new facility manager, will be at the facility one or two days per week until July 11, when he will be here full time. The new Operations Manager should be in place by the end of July. I look forward to introducing you and your staff to these new personnel at our next meeting.

Enclosed are replacement pages for the changes which presently need to be made to the Hazardous Waste Permit as a result of these changes in personnel.

- Page 1 of 7 of Part A of the Application: Facility Contact
- Page 7, Table H-1 of Section H of Part B of the Application: Emergency Response Coordinators

I will serve as primary Emergency Response Coordinator until Gary is settled in Wichita. The additional Coordinators have been trained and are prepared to act as alternates. A final list of Coordinators will be prepared to include Gary and the new Operations Manager, so that formal notification can be made to your Agency and the local emergency service providers within the time period required by 40 CFR 270.42. A copy of this letter and the attached Table H-1 will be sent to the local service providers to inform them of these interim arrangements.

Please continue to call me with any questions about this or other matters concerning our facility.

Sincerely,

Ronald K. Robertson
Facility Compliance Officer

cc: Mark Matthews, EPA Region VII
Gary Burns, Laidlaw
Dennis Mauck, Sedgwick County EMS
Chief Millikan, Wichita Fire Department
Kathy Conley, Saint Francis Emergency Center
Chief Stone, Wichita Police Department
Ken Duckworth, Sedgwick County LEPC

USPCI

Hydrocarbon Recyclers, Inc. of Wichita 2549 North New York
Wichita, Kansas 67219

Wats 800.316.0037 Phone 316.268.7500 Fax 316.268.7555

LAIDLAW
ENVIRONMENTAL
SERVICES

xc: Ashley Chadwick, Laidlaw Compliance, Nashville
Bill Vore, Laidlaw Legal, Spring

USPCI

Hydrocarbon Recyclers, Inc. of Wichita 2549 North New York
Wichita, Kansas 67219

Wats 800.316.0037 Phone 316.268.7500 Fax 316.268.7555

Hydrocarbon Recyclers, Inc. of Wichita d/b/a USPCI
RCRA Permit Application
Section H
Contingency/Emergency Plan

Table H-1

Emergency Response Coordinators

Primary Emergency Response Coordinator

Name: Ronald Robertson

[REDACTED]
316/268-7500 (work)
[REDACTED]

Ex. 6 PII

Alternate Emergency Response Coordinators

Name: Gerry Stafford

[REDACTED]
316/268-7500 (work)
[REDACTED]

Michael Green

[REDACTED]
316/268-7500 (work)
[REDACTED]

Christopher Lane

[REDACTED]
316/268-7500 (work)
[REDACTED]

Christopher Waechter

[REDACTED]
316/268-7500 (work)
[REDACTED]

<p>For EPA Regionals Use Only</p> <p>DATE RECEIVED Month: Day: Year:</p>		<p>United States Environmental Protection Agency Washington, DC 20460</p> <h2 style="margin: 0;">Hazardous Waste Permit Application</h2> <h3 style="margin: 0;">Part A</h3> <p><i>(Read the instructions before starting)</i></p>																																																																																									
<p>I. Installation's EPA ID Number (Mark 'X' in the appropriate box)</p> <table style="width:100%;"> <tr> <td style="width:50%; text-align: center;"> <input type="checkbox"/> A. First Part A Submission </td> <td style="width:50%; text-align: center;"> <input checked="" type="checkbox"/> B. Part A Amendment </td> </tr> </table>																																																																																		<input type="checkbox"/> A. First Part A Submission	<input checked="" type="checkbox"/> B. Part A Amendment								
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<p>III. Facility Location (Physical address not P.O. Box or Route Number)</p> <p>A. Street</p> <p>2 5 4 9 N N E W Y O R K</p> <p>Street (Continued)</p>																																																																																											
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<p>V. Facility Contact (Person to be contacted regarding waste activities at facility)</p> <table style="width:100%;"> <tr> <td style="width:50%;">Name (Last)</td> <td style="width:50%;">(First)</td> </tr> <tr> <td>B U R N S</td> <td>G A R Y</td> </tr> <tr> <td>Job Title</td> <td>Phone Number (Area Code and Number)</td> </tr> <tr> <td>F A C I L I T Y M G R</td> <td>3 1 6 - 2 6 8 - 7 5 0 0</td> </tr> </table>																																																																																		Name (Last)	(First)	B U R N S	G A R Y	Job Title	Phone Number (Area Code and Number)	F A C I L I T Y M G R	3 1 6 - 2 6 8 - 7 5 0 0		
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<p>VI. Facility Contact Address (See instructions)</p> <table style="width:100%;"> <tr> <td style="width:20%;">A. Contact Address</td> <td style="width:80%;">B. Street or P.O. Box</td> </tr> <tr> <td>Location: Mailing Other</td> <td></td> </tr> <tr> <td><input checked="" type="checkbox"/> <input type="checkbox"/></td> <td></td> </tr> <tr> <td>City or Town</td> <td>State Zip Code</td> </tr> <tr> <td></td> <td>-</td> </tr> </table>																																																																																		A. Contact Address	B. Street or P.O. Box	Location: Mailing Other		<input checked="" type="checkbox"/> <input type="checkbox"/>		City or Town	State Zip Code		-
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